

### **REMARKS**

Applicant respectfully requests reconsideration of the present application in view of the foregoing amendments and in view of the reasons that follow.

#### **Status of Claims:**

No claims are currently being cancelled or added.

Claims 1, 24 and 25 are currently being amended.

This response amends claims in this application. A detailed listing of all claims that are, or were, in the application, irrespective of whether the claims remain under examination in the application, is presented, with an appropriate defined status identifier.

After amending the claims as set forth above, claims 1-25 are pending in this application.

#### **Request for entry of After-final Response:**

It is respectfully requested that this after-final response be considered and entered, since it amends the claims in accordance to features that were believed to be implicit in the previously pending claims, whereby the Remarks provided in the previously-filed response, taken with the previously-filed claims, makes it clear that the intended scope of those claims was to include such features.

#### **Claim Rejections – Prior Art:**

In the Office Action, claims 1, 4-6, 10-15, 24, and 25 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. patent 6,678,867 to Fong et al. (hereafter “Fong”). Claims 2, 3, 7-9, and 16-23 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Fong in view of U.S. patent application 2002/0026461 to Kutay et al. (hereafter “Kutay”). Applicant respectfully traverses these rejections for at least the following reasons.

In the Response to Arguments section on page 8 of the Office Action, the Examiner states that “the difference between Fong and the present invention is not in ‘only using predetermined rules’ but rather the intermediate step Fong teaches before those predetermined rules are applied to a source model. There does not appear to be any claim limitation prohibiting interactive user mapping prior to the actual creation of the target model by using predetermined rules and the XML environment.”

In response, each of the presently pending independent claims has been amended to recite that the target model and a source model are created by only using predetermined rules that are not based on any user input, and that the target model and the source model are created without any user input except for a user command to initiate creation of such models automatically.

It is noted that page 9 of the Office Action states that “the term ‘automatically’ as it relates to the automatic creation of a target model and a source model still requires a user selection.” Please note that the presently pending independent claims have been amended to recite such a user selection, whereby such user selection is much different from the user-inputs required in the creation of a target model and a source model as described in Fong.

As is clear from the Examiner’s discussion of Fong on page 8 of the Office Action, Fong does not teach or suggest the above-highlighted features of the presently pending independent claims.

Since Kutay does not rectify the above-mentioned shortcomings of Fong, each of the presently pending claims is patentable over the cited art of record.

**Conclusion:**

Since all of the issues raised in the Office Action have been addressed in this response, Applicant believes that the present application is now in condition for allowance, and an early indication of allowance is respectfully requested.

The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 19-0741. Should no proper payment be enclosed herewith, as by a check or credit card payment form being in the wrong amount, unsigned, post-dated, otherwise improper or informal or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 19-0741.

If any extensions of time are needed for timely acceptance of papers submitted herewith, Applicant hereby petitions for such extension under 37 C.F.R. §1.136 and authorizes payment of any such extensions fees to Deposit Account No. 19-0741.

Respectfully submitted,

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